

Exhibit 1

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1 IN THE UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

5
6 IN RE: NATIONAL PRESCRIPTION MDL No. 2804
7 OPIATE LITIGATION

8 Case No. 17-md-2804
9 Judge Dan Aaron
10 This document relates to: Polster

11 The County of Summit, Ohio, et al.
12 v. Purdue Pharma L.P., et al.
13 Case No. 17-OP-45004

14 The County of Cuyahoga v. Purdue
15 Pharma L.P., et al.
16 Case No. 18-OP-45090

17 City of Cleveland, Ohio v. Purdue
18 Pharma L.P., et al
19 Case No. 18-OP-45132

20 ~~~~~
21 Videotaped deposition of
22 TERRENCE M. ALLAN

23 December 17, 2018
24 9:05 a.m.

25 Taken at:
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27 950 Main Avenue, Suite 1100
28 Cleveland, Ohio.

29 Renee L. Pellegrino, RPR, CLR

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1 awareness. Was there awareness in 2010 that
2 prescription drug abuse and overdose was a
3 public health problem in Cuyahoga County?

4 MR. GALLUCCI: Object to form.

5 A. The report details that it was an
6 issue, but I can't speak to the scope of it, as
7 I mentioned earlier.

8 Q. I'm not asking about the scope of
9 it. Was there awareness in 2010 that
10 prescription drug abuse and overdose was a
11 public health problem in Cuyahoga County?

12 MR. GALLUCCI: Object to form.

13 A. Yes.

14 Q. In 2010 did Cuyahoga County have
15 other public health problems?

16 MR. GALLUCCI: Object to form.

17 A. Yes.

18 Q. What were they?

19 A. Well, we had longstanding issues
20 around -- in the community around -- issues
21 around inequity in health outcomes related to
22 things like chronic disease, like obesity,
23 asthma, heart disease, that have been
24 longstanding. We were responding, as noted on
25 page 11.